



CN 028  
Trenton, N.J. 08625-0028

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State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF HAZARDOUS WASTE MANAGEMENT

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Deputy Director  
Responsible Party Remedial Action

6/14/90  
(DATE)

MEMORANDUM

TO: Distribution List *DBK*  
THROUGH: D. Kanjarpore, P.E., Section Chief  
Bureau of Federal/State Case Management  
FROM: E. G. Koup, P.E., Case Manager  
Bureau of Federal/State Case Management  
CASE: L. E. Carpenter  
CASE COMPONENT: F. S.  
SUBJECT: Final F.S. Workplan

The attached type of document on the above named facility is for your:

- ☒ Review and comment *if necessary*  
☒ Information and/or file  
☐ Action  
☐ Other

Should you have any questions or if you are unable to meet the due date, please contact me at 3-1455.

Due Date: 6/22/90

Activity Code: EGK-3

Attachment

346335



Distribution:

FYI  
ONLY

\*Comments received by  
Case Manager on

[ ]	<u>T. Ronning</u>	, Geologist	_____
		Division of Water Resources	_____
[ ]	<u>J. Prendergast</u>	, Technical Coordinator	_____
		BEERA/Division of Hazardous	_____
		Site Mitigation	_____
[ ]	_____	, Regulatory Officer	_____
		Division of Regulatory Affairs	_____
[ ]	_____	, Assistant Director	_____
		Division of Regulatory Affairs,	_____
		Enforcement Element	_____
[ ]	_____	, Bureau of Community	_____
		Relations	_____
[ ]	_____	, Division of Solid Waste	_____
[ ]	_____	, Division of Environmental	_____
		Quality	_____
Direct Marking from PRP	[X] <u>J. Joseph</u>	, USEPA II	_____
	[ ] _____	, DAG	_____
	[ ] _____		_____
	[ ] _____		_____

\*Document received from EPA/RP on  
Scheduled Actual

6/11/90

6/12/90

\*Response sent to  
EPA/RP on

\*This information is filled out by the Case Manager and a copy of the completed memorandum is forwarded to the Section Chief and MIS.

c. Section Chief (no attachments)  
MIS (no attachments)



WESTON WAY  
WEST CHESTER, PA 19380  
PHONE: 215-692-3030  
TELEX: 83-5348

11 June 1990

Mr. Edgar G. Kaup, P.E.  
Case Manager  
New Jersey Department of  
Environmental Protection  
401 East State Street  
CN028  
Trenton, NJ 08625-0028

BUREAU OF  
FEDERAL CREDIT ADMINISTRATION

JUN 12 1990

Re: L.E. Carpenter and Company Project  
Wharton, New Jersey  
Revised Feasibility Study Work Plan

Dear Mr. Kaup:


Attached is the revised Feasibility Study Work Plan for the L.E. Carpenter and Company Site in Wharton, New Jersey prepared by Roy F. Weston, Inc. (WESTON). As per your request during our June 5 phone conversation, work on the Feasibility Study (FS) will begin immediately following this submittal with no additional comment period.

The attachment to this letter provides responses to the specific comments raised in your letter dated 25 April 1990 reviewing the draft FS Work Plan. These responses have been incorporated into the revised FS Work Plan as noted.

If you have any questions, please call me at (201) 225-3990.

Very truly yours,

ROY F. WESTON, INC.

  
Vito J. Cappello, P.E.  
Project Director/  
Regional Manager

/bs  
Attachment

cc: C. Anderson  
R. Hahn



## ATTACHMENT

### RESPONSE TO COMMENTS ON FS WORK PLAN

- Item: Findings of the Remedial Investigation, p. 2-1  
The FS Work Plan identifies that "remnants of drums were found in three test pits in the area to the west of the drainage ditch." Other than the test pit logs, where was this information discussed in the RI Report?
- Response: The FS Work Plan has been revised to report the field observation of drum remnants in four test pits, namely 4B, 5B, 23 and 72. These observations are contained in the test pit logs, Appendix B of the RI, and were mentioned in the NJDEP's comments on the RI.
- Item: Weston must define "acceptable ambient levels". The volatile organic results from May 1989 are of significant levels to warrant further examination.
- Response: The draft RI report used OSHA threshold limit values, an eight hour time weighted average concentration standard, as the basis for acceptable ambient levels. The ambient air data will be compared with health-based standards as part of the risk assessment.
- Item: Conceptual Site Model, p. 3-3  
The conceptual site model developed by WESTON for the L.E. Carpenter site suggests that on-site air quality is not be impacted and is therefore not a potential exposure pathway. The Department will require air pollution control if the selected remediation includes soil processing that causes air emissions. Further data/information will be requested in that phase of the remediation.
- No modification required. The potential for an airborne exposure pathway will be discussed in the Risk Assessment.
- Item: Identification/Screening Zof Remedial Technologies, p. 5-1  
The Initial Development and Initial Screening of Remedial Alternatives document submitted by GeoEngineering (dated 30 January 1990) is no longer undergoing review by the Department as stated in the Work Plan. Oral comments were presented to representatives of GeoEngineering and L.E. Carpenter at the meeting of 8 February 1990. Although the document was found to be a good initial effort, it is deficient in details required by SARA and will require expansion.



Response: This change in status is reflected in the revised FS Work Plan.

Item: Schedule and Deliverables, p. 8-2  
As proposed, the Feasibility Study will consist of two deliverables, this Work Plan and the Feasibility Study Report. To facilitate adequate communication and proper technical decisions, a report on the development and screening of remedial alternatives must be submitted independent of the detailed analysis of remedial alternatives. This Phase I deliverable must be reviewed and approved by NJDEP before work commences on the Phase II detailed analysis.

Response: An interim draft on the development of remedial alternatives, which is to be reviewed and approved by NJDEP, has been included in the project schedule, Figure 8-1. The purpose and schedule of this report are discussed further in Section 8.

Item: FS Activities  
The FS activities must proceed independent of supplemental Remedial Investigation field activities. Sufficient data on plume dimensions, contaminant properties and site hydrogeology are available to develop and select an appropriate technology to remediate the majority of the contaminated groundwater and soils at the site. Any areas not fully delineated to date may be handled as a separate operable unit.

Response: The revised schedule calls for concurrent work on Phase I of the FS and the supplemental RI data gathering activities. Phase II of the FS, the screening and detailed analysis of alternatives, will require NJDEP comments on the supplemental RI and the risk assessment.

Item: Feasibility Study  
Activities must proceed, at the minimum, according to or ahead of the schedule in the subject document. The Department desires completing this project as quickly as possible.

Response: The revised schedule in Figure 8-1 reflects NJDEP's sense of urgency. Every effort will be made to complete tasks ahead of schedule where possible.